

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JAIME VIAL, *as representative of the heirs of  
Rene Correa Borquez and on behalf of those  
similarly situated,*

Plaintiff,

v.

ELIZABETH MAHER MUOIO, *in her  
official capacity as TREASURER OF THE  
STATE OF NEW JERSEY,* et al.,

Defendants.

Civil Action No. 3:24-cv-11301-RK-JBD

**STIPULATION AND ORDER  
EXTENDING DEFENDANT KELMAR  
ASSOCIATES, LLC'S TIME TO  
ANSWER, MOVE, OR OTHERWISE  
RESPOND TO THE COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED that the time for defendant, Kelmar Associates, LLC ("Defendant"), to answer, move, or otherwise respond to the Complaint filed in commencement of this action on December 19, 2024 [Dkt. No. 1], which was served on Defendant on or around December 20, 2024, is hereby extended from January 10, 2025 up to and including February 10, 2025. The parties acknowledge that this Defendant's first extension of time to respond to the Complaint; and it is further

STIPULATED AND AGREED that by entering into this stipulation, plaintiff, Jaime Vial, as representative of the heirs of Rene Correa Borquez and on behalf of those similarly situated, consents to this extension, and Defendant does not waive any defenses provided by statute or common law; and it is further

STIPULATED AND AGREED that this stipulation may be executed in counterparts and facsimile signatures shall have the same force and effect as originals.

**WILENTZ, GOLDMAN & SPITZER, PA**

*Attorneys for Plaintiff, Jaime Vial, as  
representative of the heirs of Rene Correa  
Borquez and on behalf of those similarly  
situated*

By: /s/ Kevin Peter Roddy

Kevin Peter Roddy, Esq.

**COLE SCHOTZ, P.C.**

*Attorneys for Defendant, Kelmar Associates,  
LLC*

By: /s/ Elizabeth A. Carbone

Elizabeth A. Carbone, Esq.

And

**HEMENWAY & BARNES LLP**

*Attorneys for Defendant, Kelmar Associates,  
LLC*

By: Ryan P. McManus, Esq. (*pro hac vice*  
application forthcoming)

**IT IS SO ORDERED:**

HON. J. BRENDAN DAY, U.S.M.J.